

Remarks

This amendment and the accompanying RCE is filed rather than pursue the appeal from the final rejection identified by the Notice of Appeal. Applicants amends claims 1, 3, 8-9, 13 and 15 to better define the invention. Specifically, claim 1 is amended to specify that the first file is one of the files stored on the file server and to clarify the relation between the first URL request and the first file. It is believed that these changes make explicit prior implicit aspects of the claim. The term "second IP address" is replaced by the broader term "first destination address." Reexamination and reconsideration are respectfully requested.

The final Office Action rejected claims 1-20 as obvious over U.S. Patent No. 5,751,956 to Kirsch (the Kirsch patent) either taken alone or in combination with U.S. Patent No. 6,298,341 (the Mann patent). Specifically, the final Office Action rejected claims 1-11, 13-15 and 17-19 as obvious over the Kirsch patent taken alone and rejected claims 12, 16 and 20 as obvious over the Kirsch patent taken in view of the Mann patent. Because the Kirsch patent describes only a specialized embedded URL and an associated accounting system for improved counting of advertising-related "clicks," the Kirsch patent neither teaches nor suggests the applicant's URL forwarding system. The Mann patent similarly teaches nothing about URL forwarding and so cannot remedy the inadequacies of the Kirsch patent.

Independent claim 1 of this application defines a URL forwarding system that requires the storage of a "first file," the contents of which can be accessed by a first web server in response to a first URL request to extract a destination server address. The contents of the "first file" can be changed by a user through a second web server. This requires that the "first file" of claim 1 be accessible by different types of web servers for different purposes and at different times. The "first file" must therefore be a persistent file of the type that can be stored on a file server. The "first file" limitation of the claims of the present application cannot be met by

any file described or suggested by the Kirsch patent or any other cited art. Nor does the Kirsch patent or any other prior art of record describe using a first file to translate a URL request into a destination server address different from that dictated by the domain name system. There is no reason apparent from the prior art why any system would have a "first file" that stores URL forwarding information. That function is only found in the present application.

The claims of the application also distinguish over the cited art by defining the use of a domain management interface to modify the information within the first file and by defining a process for authenticating the rights of a user to modify the contents of the first file. Of course, none of the cited art describes or suggests the recited "first file." None of the cited art provides a facility for changing the association between a URL and a destination server address stored within the first file. Nor does the cited art check to determine if a user has the rights to change the association between a URL and an IP address stored within the first file.

Claim 11 defines a specific implementation of a domain management interface that requires a browser and a hyperlink for selecting a URL forwarding function. Because URL forwarding is nowhere discussed in the prior art, claim 11's interface for setting up a URL forwarding function is not anticipated or made obvious by the prior art.

Certain of the dependent claims of the application recite features related to determining if advertising is to be added to the content returned in response to a URL request. This is provided in the application's system to allow a URL forwarding function to be subsidized by advertising. Because the Kirsh patent cited against this application is directed to serving advertising as the requested content, there is no suggestion of the features defined by, for example, dependent claim 6 for determining if advertising is to be added to the content associated with a URL request.

The primary reference cited against the claims is U.S. Patent No. 5,751,956 to Kirsch. The Kirsch patent relates to a mechanism for accurately counting click-through from embedded URL's to advertising websites. When a user clicks on a hyperlink within a webpage operating according to the Kirsch patent, the hyperlink causes the user's browser to send a special "redirect" URL message to a special web server 30. Kirsch patent, col. 6, lines 49-52, col. 7, lines 8-23. The web server 30 receives the redirect URL message and extracts accounting information from the redirect URL message. After the accounting information is extracted, a portion of the original redirect URL message is forwarded to a server that provides the advertising content related to the original hyperlink clicked by the user.

The key to the Kirsch patent's system is its special redirection URL, which has the general form:

`http://<direct_server>/redirect?<data>?http://<redirect_server>`

Kirsch patent, col. 7, line 23. In this string, "http://<direct_server>" is the URL of the special web server 30 (FIG. 2 of the Kirsch patent) that receives the complete redirect URL message and extracts and processes the accounting information from the redirect URL message. The next part of this string, "redirect?<data>?", is a command that identifies the URL message as a redirect message to the special web server 30. Kirsch patent, col. 7, lines 35-41. Within this part of the string, "<data>" includes the accounting information used by the special web server 30 to count the advertising information. Kirsch patent, col. 23, lines 42-53. Finally, the last part of this string, "http://<redirect_server>", is the URL of the advertising server to which the URL request is redirected, which is not illustrated in the Kirsch patent.

Thus, the Kirsch patent describes an embedded URL message that carries two different URLs that translate to two different IP addresses of two different

physical servers, the accounting (direct) server 30 and the advertising or redirect server (not shown). Each of the URLs within the embedded URL message is translated by the domain name system to the physical server at the IP address associated with the respective URL. In other words, the domain name system contains all of the information needed to determine the IP addresses of the servers referenced in the embedded URL of the Kirsch patent's system. Because of this, the Kirsch patent's system does not provide a file server or any file system at all that could be used to store or look up IP addresses to which a URL might be forwarded. All of the information for directing the two components of the Kirsch patent's embedded URL message is contained within the embedded URL message and the domain system. There is no need for a file that would contain information needed for URL forwarding.

This application's claims are patentable over the prior art because they define a system that translates a URL request into a second, destination server address, different from the first IP address the domain name system gives for that URL, by retrieving information about the second, destination server address from a file stored on a file server. This is specified in the language of claim 1, which recites that "a first file...identified by the first URL request...contains a first destination address of a first destination server, the first web server returning the first destination address as part of the message in response to the first URL request." By contrast, the cited Kirsch patent does not access a file from a file server in response to a URL request. It never would. This is because the embedded URL message of the Kirsch patent's system includes the two URLs of the two servers to be accessed and both of these URLs are translated according to the associations between URLs and IP address stored in the domain name system. The Kirsch patent does not have "a first file [that] contains a first destination address" as required by claim 1 because the Kirsch patent always directs URL requests to the

first IP address (as defined by claim 1) and always does so by accessing the domain name system.

The Kirsch patent's special embedded URL message,
http://<direct_server>/redirect?<data>?http://<redirect_server>,
contains two different URLs, "http://<direct_server>" and "http://<redirect_server>". The first of these URLs, "http://<direct_server>", is the URL of the server 30 and would have to correspond to the "request for a first URL" recited by claim 1. This URL, "http://<direct_server>", resolves to the IP address of the first server 30 according to the domain name system. This first URL, "http://<direct_server>", is never associated with a second IP address, different from the one dictated by the domain name system, in any file on any file server of the Kirsch patent's system. Consequently, the Kirsch patent cannot meet claim 1's recitation of "a first file [that] contains a first destination address of a first destination server."

The second URL of the Kirsch patent's embedded URL message, "http://<redirect_server>", is the URL of the redirect server and resolves to the IP address for that redirect or advertising server. "http://<redirect_server>" also does not meet the limitations of claim 1. If the Kirsch patent's second listed URL, "http://<redirect_server>", is considered the "first URL" of claim 1, it does not meet the limitations of claim 1 in that the URL, "http://<redirect_server>", always resolves to the IP address of the redirect server (not shown in the Kirsch patent) according to the domain name system. The URL, "http://<redirect_server>", is never associated with a second IP address, different from the one dictated by the domain name system, in any file on any file server of the Kirsch patent's system. Consequently, neither of the two URLs of the Kirsch patent's embedded URL meets claim 1's recitation of "a first file [that] contains a first destination address of a first destination server."

Still further, the Kirsch patent does not meet claim 1's requirement of "a domain management interface having a process for authenticating a user's right to modify contents of the first file." This aspect of claim 1 relates to the fact that a user can modify the URL forwarding instructions, for example by changing the IP address of the server to which the URL is redirected, through a browser or similar tool. Validating the user's rights to modify the contents of the first file (which contains the forwarding information) is needed to allow such a remote, user-directed modification. This is not done in the Kirsch patent's system. The only sort of validation that is performed in the Kirsch patent's system is to check whether a client machine has the right to access certain website content. See Kirsch patent, column 8, lines 3-19. The "tampering" referred to in this passage of Kirsch relates to a client machine repeatedly accessing a website to generate "hits" or "counts" that might translate into undeserved advertising revenue. This aspect of Kirsch has nothing to do with verifying that a user has the rights to change the address to which a URL will be redirected.

Because the Kirsch patent does not teach "a domain management interface having a process for authenticating a user's right to modify contents of the first file," claim 1 distinguishes over the Kirsch patent. None of the other references of record address this aspect of the claimed invention. As such, claim 1 and its dependent claims 2-20 distinguish over the Kirsch patent taken alone or in combination.

In view of the foregoing, it is respectfully submitted that the application is in condition for allowance. Reexamination and reconsideration of the application, as amended, are requested.

If for any reason the Examiner finds the application other than in condition for allowance, the Examiner is requested to call the undersigned attorney at the Los Angeles, California telephone number (213) 337-6700 to discuss the steps necessary for placing the application in condition for allowance.

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If there are any fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-1314.

Respectfully submitted,
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